



Orientation, Tutoring and Counselling Service

Policy for the Processing of personal data collected from the person concerned art. 13 of EU Reg. 2016/679 - GDPR

1. DATA PROCESSORS

The DATA CONTROLLER pursuant to articles 4 and 24 of EU Reg. 2016/679 is the International University of languages and Media IULM, with headquarters in Via Carlo Bo 1 - 20143 Milan, in the person of its pro-tempore legal representative.

The University, in accordance with art. 37-39 Reg. UE 2016/679, appointed Data Protection Officer, who can be contacted at the following email address: dpo.iulm@dpoprofessionalservice.it.

2. PURPOSE AND LAWFULNESS OF PROCESSING

Personal data shall be processed lawfully, in compliance with the provisions of art. 6 of EU Reg. 2016/679, for the following purposes:

- A. pursuant to art. 6, par. 1, lett. f) - response to general requests for information relating to the University by sending of documentation (e.g. information material) concerning the University's educational offer (e.g. degree courses, master's degree courses, professional training courses);
Data processing is based on art. 6, par. 1, lett. f) (recital 47), taking into account the reasonable expectations of the data subject at the time and in the context of the collection of personal data, where the data subject can reasonably expect that processing for this purpose will take place.
- B. pursuant to art. 6, par. 1, lett. b) - registration for orientation events (e.g. Open Day, Junior Summer School) and all related administrative and organizational activities, included orientation interviews, customer satisfaction surveys, issuance of participation certificates;
- C. pursuant to art. 6, par. 1, lett. b) - support services as tutorship, orientation talks and counseling;
- D. pursuant to art. 6, par. 1, lett. a) - with prior consent and until objection, the receipt of communications - via e-mail (newsletters), SMS or instant messaging services - relating to events and initiatives promoted by the International University of languages and Media IULM;

3. DATA RECIPIENTS OR RECIPIENT CATEGORIES

The supplied personal data may be transferred to the recipients mentioned in art. 28 and in art. 29 of EU Reg. 2016/679, who shall process them in the capacity of data processors and/or as individuals operating under the authority of the Controller and Processor, in order to comply with the relevant contracts or purposes. More specifically, data may be transferred to recipients in the following categories:

- entities carrying out maintenance on the information system and the data collection platform;
- subjects who provide assessment tests and online questionnaires;
- authorized persons within the Data Controller organization.

Subjects belonging to the abovementioned categories shall become the Data Processors, or shall operate in a completely autonomous way, as Data Controllers in their own right. The list of designated Data Processors is constantly updated and is available at the International University of languages and Media IULM main office.

4. DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS

Personal data will not be transferred abroad within or outside the European Union.

If Controller has to transfer Your data abroad, inside or outside the European Union, the transfer will be made within the limits of and in compliance with the conditions of articles 44 and ff. of EU Reg. 2016/679.



5. STORAGE PERIOD OR CRITERIA

Data shall be processed automatically and/or manually, in a manner and with tools that ensure maximum security and confidentiality, by specifically appointed subjects.

In compliance with the provisions of art. 5 par. 1 lett. e) of EU Reg. 2016/679, the collected personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed, however for a maximum period of 10 years.

6. PROVISION AND REFUSAL OF PERSONAL DATA

Provision of personal data for the purposes of paragraph A) of this policy is necessary in order to give feedback to requests for information relating to the University, any failure to provide personal data shall entail the impossibility to manage the information request.

Provision of personal data for the purposes of paragraph B) of this policy is necessary in order to manage the data subject's registration for orientation events and enrolment in the relevant activities. Any failure to provide relevant personal data shall entail the impossibility to manage the application.

Provision of personal data for the purposes of paragraph C) of this policy is necessary in order to provide services, any failure to provide data shall entail the impossibility to provide services.

Provision of personal data for the purposes of paragraph D) (newsletter subscription) is discretionary, even though the failure to provide such data shall entail the impossibility to receive the newsletters concerning events and initiatives organised by the Data Controller, without prejudice for the purposes under paragraph A), B) and C).

7. RIGHTS OF THE DATA SUBJECTS

You shall be able to unsubscribe from the newsletter clicking on the link "cancellati dalla mailing list" (unsubscribe) in the footer of the message.

You shall be able to exercise your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of EU Regulation 2016/679 by writing to the Data Controller, the Data processor or the Data Protection Officer at the following address: privacy@iulm.it

You shall have the right to obtain, at any moment, from the Controller, access to your personal data, and their rectification or erasure, as well as the restriction of their processing. Moreover, you have the right to object to the processing of your data (including automated processing, such as, for instance, profiling) and to receive the personal data concerning you. Without prejudice for any other administrative and jurisdictional recourse, if you believe that the processing of your personal data violates the provisions of EU Reg. 2016/679, you have the right, pursuant to art. 15 letter f) of said EU Reg. 2016/679, to lodge a complaint with the Data Protection Authority and, pursuant to art. 6 paragraph 1 letter a) and to art. 9 paragraph 2 letter a), to revoke your consent to the processing at any time.

In case of a request for data portability, the Data Controller shall provide your personal data to you in a structured, commonly used and machine-readable format, without prejudice for the provisions of paragraphs 3 and 4 of art. 20 of EU Reg. 2016/679.

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